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**Attorneys for Plaintiffs**

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DON'T SHOOT PORTLAND, et al.

Plaintiffs

v.

CITY OF PORTLAND, a municipal  
corporation,

Defendant.

Case No. 3:20-cv-00917-HZ

DECLARATION OF SHIOAN OUDINOT IN  
SUPPORT OF PLAINTIFF'S MOTION FOR  
CLASS CERTIFICATION  
ORAL ARGUMENT REQUESTED

I, Shioan Oudinot, declare as follows pursuant to 28 USC § 1746:

1. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.

2. On or around July 20, 2020, I attended a protest in North Portland. I was with many others near the intersection of N Lombard and N Interstate. The police declared a riot and moved the crowd south down Interstate Ave. The announcement I heard declaring a riot was made by Portland Police Bureau. The officers I saw rush at the crowd that day all looked like they were wearing PPB uniforms.

3. I saw a non-aggressive young protester, with both hands up next to his shoulders, trying to move north away from the police line. The police had let some protesters get through the police line and the young protester was trying to do the same. Instead of letting him through, he was hit with a baton by a Police officer. The officer had both hands on his baton, took 3-5 running steps from 12-15 feet away and drove the young person right into some concrete pilings. The protester was hit so hard with the baton he tripped over the concrete and fell to the ground with immense force.

4. I was in the front of the crowd and had an umbrella. I had an umbrella to use as a shield and to protect myself from being hit with pepper balls and pepper spray. I never used my umbrella as a weapon. At no point did I threaten anyone or make any threatening gestures.

5. I overheard a close by police officer say, "If you have an umbrella, we are going to fuck you up." I was complying and moving south as fast as I could with my umbrella up. The umbrella was snatched from my hand, and I never saw it again. One officer was about eight to ten feet away from me and we made eye contact. The officer ran straight toward me and used his baton to strike the left side of my body, at my ribs. He hit me very hard with the end of the baton like a spear. At the moment I was hit my arms were at my side.

6. I twisted my body to try to deflect the baton contact to my ribs. By twisting I was able to deflect some of the blow from the baton. I was in pain and cussed at the officer. I asked the officer for his name and badge number. He did not reply. The officer was standing right in front of me, less than 5 feet away. He reached for a can of crowd control pepper spray he had attached to his hip.

7. Crowd control pepper spray emits a cloud of spray as opposed to a single stream. The officer reached toward me with the can and sprayed me with pepper spray on my face from less than a foot away. The pepper spray got into my eyes, mouth, and nose. The officer never gave me any commands. I was wearing a hooded sweatshirt with the hood on my head and pepper spray got all over the inside of the hood.


8. I split off from the group, left the area, and sat down to take off my sweatshirt. Removing the hood over my face made it difficult to breathe as it was saturated with pepper spray. I was sore and bruised for a week from being hit with the baton.

9. To the best of my knowledge, it was a Portland Police officer that hit me because the officer responsible was wearing a uniform that looked like PPB. I attended over 50 protests

during the summer of 2020 and have PTSD and anxiety from my experiences. I stopped attending protests due to physical and mental reasons.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 7<sup>th</sup>, 2022.

  
Shioan Oudinot (Jan 10, 2022 10:08 PST)

SHIOAN OUDINOT